

# EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FELLOWES, INC.,

Plaintiff,

vs.

AURORA CORP. OF AMERICA,

and,

AURORA OFFICE EQUIPMENT, LTD.

Defendants.

Civil Action No.: 07 C 7237

**DECLARATION OF LINDA CHEN IN  
SUPPORT OF AURORA CORP. OF  
AMERICA'S MOTION TO DISMISS,  
TRANSFER, OR STAY THIS LAWSUIT**

Judge: Charles P. Kocoras  
Magistrate Judge: Arlander Keys

**DECLARATION OF LINDA CHEN**

I, Linda Chen, declare:

1. I am employed by Aurora Corp. of America ("Aurora"), a defendant in the above captioned lawsuit. I have personal knowledge of the facts set forth herein, except as to those matters stated on information and belief and, as to those matters, I am informed and believe them to be true. If called upon I could and would competently testify thereto.
2. I have been employed by Aurora for the past four years, and my current position is Vice President of Operations.
3. Aurora was founded in 1975 and is a provider of various office machines, including document shredders, calculators, laminators and presenters. Aurora's principal place of business is located in the County of Los Angeles, at 3500 Challenger Street, in Torrance, California. Aurora has 19 employees at its Torrance facility.
4. On or about May 30, 2007, attorneys for Fellowes sent Aurora a cease and desist letter alleging that Aurora's Touchguard shredders infringed Fellowes' "SafeSense" technology.

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The patent for SafeSense issued on December 25, 2007, Patent No. 7,311,276 ("'276 patent").

5. I authorized that Aurora file a declaratory relief action in the Central District of California, choosing this forum because it is the closest Federal district court to Aurora's Torrance headquarters.
6. Aurora would suffer hardship if it were required to litigate this matter in Illinois. In addition to me, several Aurora employees, all of whom are residents of California, have knowledge of the facts and circumstances surrounding this action and would likely be called to testify.

These employees include, but are not limited to the following:

- Kevin Chen -- President;
- Jones Tsai -- Product Planning Director;
- George Cheng -- Operations Director;
- Amy Sum -- Accounting Supervisor; and
- Charles Du -- Accounting Manager.

7. Aurora also anticipates that it may call upon witnesses to testify who reside in China. It would be much more convenient for these witnesses to travel to California, rather than to Illinois.
8. Another important witness in this case is Morris Adato, an independent consultant who has been retained by Aurora. He has personal knowledge regarding the sales and marketing of Aurora's products, and of the needs and requirements of Aurora's customers. He has over 40 years experience in the consumer electronics field. Mr. Adato, 73 years of age, is located in the Los Angeles area, and, as such requiring him to travel to Illinois would be very difficult.

9. Ingram Micro located in Irvine, California, sells Fellowes shredders. It is expected that sales information will be sought from this company.
10. Amazon, located in Seattle, Washington and Fred Meyer Department Stores, located throughout Oregon are customers of Aurora. It is expected that sales information will be sought from these customers as well.
11. Many of the documents upon which Aurora would rely in this litigation are located in Aurora's Torrance headquarters.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration is executed on this 29 day of January, 2008 in Newport Beach, California.

  
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Linda Chen